

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

| | | |
|----------------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 2:06-cr-0169-WHA |
| |) | |
| JAMES CALVIN TALLEY, |) | |
| |) | |
| Defendant. |) | |

MOTION FOR REIMBURSEMENT OF COPY EXPENSE

COMES NOW the defendant, James Calvin Talley, by and through the undersigned counsel, Richard K. Keith, and respectfully requests this Honorable Court to allow this indigent defendant to be reimbursed for expenses incurred when discovery was obtained in this matter.

As grounds in support thereof, the following is stated:

1. Discovery in this sixteen (16) defendant case is voluminous and consists of: 1) 7,428 paper copies; 2) 10 DVDs; 3) 19 CDs; 4) 1 floppy disc; 5) 6 VHS videos; and 6) 23 audio cassette tapes.
2. The United States Attorney's Office made discovery in this case available through the services of Pro Legal Copies of Montgomery, Inc. at the expense of the defendant.
3. Defendant Talley obtained a complete set of discovery costing the undersigned a total of \$1,234.35 (EXHIBIT A).

WHEREFORE, premises considered, Defendant respectfully requests this Honorable Court to issue an Order allowing him reimbursement for such copying expenses.

Respectfully submitted this 16th day of March, 2007.

s/ Richard K. Keith
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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

A. Clark Morris, AUSA
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s/ Richard K. Keith
OF COUNSEL